

November 29, 2023

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISIONCLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: CR  
Deputy

UNITED STATES OF AMERICA,

§ CRIMINAL NO. **DR:23-CR-03036-AM**

Plaintiff,

§ **INDICTMENT**

v.

§ [COUNT ONE: Conspiracy to traffic  
§ firearms, 18 U.S.C. § 933(a)(1), (a)(3), and  
§ (b); COUNT TWO: Trafficking Firearms 18  
§ U.S.C. § 933(a)(1) and (b); COUNT  
§ THREE: Conspiracy to Smuggle Goods  
§ from the United States, 18 U.S.C. § 554 &  
§ 18 U.S.C. § 371; COUNT FOUR:  
§ Smuggling Goods from the United States, 18  
§ U.S.C. § 554.]SANTIAGO RAMIREZ,  
Defendants.

## THE GRAND JURY CHARGES:

COUNT ONE  
[18 U.S.C. § 933(a)(1), (a)(3), and (b)]

Beginning on a date unknown but no later than October 23, 2023 through on or about  
October 30, 2023, in the Western District of Texas, Defendant,

SANTIAGO RAMIREZ,

did knowingly conspire and agree together and with persons known and unknown, to ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including but not limited to:

- 1) a Smith & Wesson, Model 469, 9 mm (S/N: A858682),
- 2) Hungarian Arms Works, PPH, .380 caliber (S/N: N03441),
- 3) Glock, Model 44, .22 caliber (S/N: AERZ973),
- 4) a Smith & Wesson, Model M&P9, 9 mm (S/N: HSF7660),
- 5) Berreta, Model M9, 9mm (S/N: M9-223168),

- 6) GSG, Firefly, .22 caliber (S/N: F449159),
- 7) Glock, Model 17 Gen 5, 9mm (S/N: BYVF554),
- 8) Glock, Model 17 Gen 5, 9mm (S/N: BWAB262),
- 9) Glock, Model 44, .22 caliber (S/N: AEEB915),
- 10) Pietro Berreta, Model 99A1, 9mm (S/N: A072722Z),
- 11) Berreta, Model M9 A1, 9mm (S/N: BER754099),
- 12) Berreta, Model 92S, 9mm (S/N: X23195Z),
- 13) Berreta, Model IC34, 9mm (S/N: 673276),
- 14) a Smith & Wesson, Model M&P9, 9 mm (S/N: NCX0317),
- 15) Browning, 9mm pistol (S/N: 633656),
- 16) a Smith & Wesson, Model SD9, 9 mm (S/N: FZU0293),
- 17) Glock, Model 19Gen5 (Frame S/N: ACMR833), (slide S/N: BWSB785),
- 18) Berreta, Model M9, 9mm (S/N: 244366),
- 19) Glock, Model 19Gen5, 9mm (S/N: CAHB678),
- 20) GSG, Firefly, .22 caliber (S/N: F449547),
- 21) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FEF6173),
- 22) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FBU7902),
- 23) a Smith & Wesson, Model SD9VE, 9 mm (S/N: HFK4679),
- 24) Taurus, Model G3, 9mm (S/N: AAM154901),
- 25) Berreta, Model PX4 Storm, .40 caliber (S/N: PY31590),
- 26) Berreta, Model PX4 Storm, 9mm (S/N: PX17189),
- 27) Canik, Model METESFT, 9mm (S/N: T6472-21 CC28289),
- 28) Taurus, Model PT92AF, 9mm (S/N: TGS00427),

- 29) Taurus, Model G3C, 9mm (S/N: ADL954329),
- 30) Ruger, Model P89DC, 9mm (S/N: 304-33818),
- 31) Berreta, Model M9, 9mm (S/N: 234073),
- 32) Glock, Model 19, 9mm (S/N: ESV545US),
- 33) Glock, Model 19, 9mm (S/N: BEBA400),
- 34) Berreta, Model 92FS, 9mm (S/N: BER242581Z),
- 35) Berreta, Model 92FS, 9mm (S/N: BER797601),
- 36) Berreta, Model M9 A1, 9mm (S/N: BER583109),
- 37) Berreta, Model 92 A1, 9mm (S/N: BIN019275),
- 38) Berreta, Model 92X, 9mm (S/N: 92X0042402),
- 39) Berreta, Model 92 FS, 9mm (S/N: BER163805Z),
- 40) Berreta, Model M9, 9mm (S/N: M9-201001),
- 41) Berreta, Model 92X, 9mm (S/N: 92X0050585),
- 42) Berreta, Model APX, 9mm (S/N: A008602X),
- 43) Glock, Model 17, 9mm (S/N: NEA368),
- 44) Berreta, Model 92G, 9mm (S/N: BER454042Z),
- 45) Tisas, Model Faith 13, .380 caliber (S/N: T0620-21J01085),
- 46) Pietro Berreta, Model 75, .22 caliber (S/N: 46026),
- 47) Tanfoglio, Model Titan II, .380 caliber (S/N: EB05403),
- 48) Berreta, Model 92X, 9mm (S/N: 92X0011244),
- 49) Berreta, Model 92FS, 9mm (S/N: BER832190),
- 50) Carl Walther, Model Colt Government, .22 caliber (S/N: LK030667),
- 51) Colt, Model Woodsman, .22 caliber (S/N: 117166-S),

- 52) Berreta, Model M9, .22 caliber (S/N: BM002723),
- 53) Ruger, Model P94, .40 caliber (S/N: 34043514),
- 54) Pietro Berreta, Model 92FS, 9mm (S/N: A207512Z),
- 55) Ruger, Model 10 22, .22 caliber (S/N: 2168331),
- 56) Ruger, Model 10 22, .22 caliber (S/N: 0022-66729),
- 57) Ruger, Model 10 22, .22 caliber (S/N: 0022-94445),
- 58) Ruger, Model 10 22, .22 caliber (S/N: 0021-85762),
- 59) Ruger, Model 10 22, .22 caliber (S/N: 823-86399),
- 60) Ruger, Model 10 22, .22 caliber (S/N: 0024-16244),
- 61) Ruger, Model 10 22, .22 caliber (S/N: 0021-91318),
- 62) Ruger, Model 10 22, .22 caliber (S/N: 0023-20196),
- 63) Ruger, Model 10 22, .22 caliber (S/N: 829-14340),
- 64) Ruger, Model 10 22, .22 caliber (S/N: 355-15686),
- 65) Ruger, Model 10 22, .22 caliber (S/N: 0022-72651),
- 66) Ruger, Model 10 22, .22 caliber (S/N: 0011-54056),
- 67) Ruger, Model 10 22, .22 caliber (S/N: 0021-99424),
- 68) Ruger, Model 10 22, .22 caliber (S/N: 0023-00869),
- 69) Ruger, Model 10 22, .22 caliber (S/N: 0021-90177),
- 70) Marlin, Model 60 SB, .22caliber (S/N: 98466378),
- 71) Remington, Model Speedmaster 552, .22 caliber (S/N: A1588225),
- 72) Ranger, Model 101.16, .22 caliber (S/N: Unknown),
- 73) Winchester, Model 190, .22 caliber (S/N: B952546),
- 74) Savage Arms- Stevens, Model Stevens 62, .22 caliber (S/N: L186235),

- 75) Savage Arms, Model 135, .22 caliber (S/N: D795642),
- 76) Rossi, Model RS22, .22 caliber (S/N: 7CA374927R),
- 77) Rossi, Model RS22, .22 caliber (S/N: 7CA397881R),
- 78) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ECF105455),
- 79) Marlin Firearms Co., Model 60, .22 caliber (S/N: 2213098),
- 80) Remington, Sportsmaster 512, .22 caliber (S/N: Unknown),
- 81) Wards Westernfield, Model 87-SB87-TA, .22 caliber (S/N: Unknown),
- 82) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ELJ3537810),
- 83) Mossberg Int, Model 500 A, 12 gauge (S/N: L373290),
- 84) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 22339414),
- 85) Mossberg Int, Model 835, 12 gauge (S/N: UM451569),
- 86) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 21344730),
- 87) Rossi, Model RS22, .22 caliber (S/N: 7CA392350R),
- 88) Savage Arms, Model Stevens 62, .22 caliber (S/N: 621156),
- 89) Savage Arms, Springfield Model 87A, .22 caliber (S/N: Unknown),
- 90) Marlin Firearms Co., Model 60W, .22 caliber (S/N: 4262583),
- 91) J Stevens Arms Co., Springfield Model 87, .22 caliber (S/N: Unknown),
- 92) Remington, Speedmaster 552, .22 caliber (S/N: 1626519),
- 93) Marlin Firearms Co., Model 60, .22 caliber (S/N: MM58080H),
- 94) Winchester, Model 190, .22 caliber (S/N: 317201),
- 95) High Standard Manufacturing, Pointer, 20 gauge (S/N: 3061418),
- 96) Winchester, Model 290, .22 caliber (S/N: 627096),
- 97) Mossberg & Sons, Model 250C, .22 caliber (S/N: Unknown),

- 98) Marlin Firearms Co., Glenfield Mod 75, .22 caliber (S/N: 71438613),
- 99) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 100) Savage Arms, Springfield Model 187R, .22 caliber (S/N: Unknown),
- 101) Mossberg, Blaze, .22 caliber (S/N: RA0031155),
- 102) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 103) Savage, Model 64, .22 caliber (S/N: L247517),
- 104) Sears Ted Williams, Model 34, .22 caliber (S/N: Unknown),
- 105) Savage Arms, Savage 64, .22 caliber (S/N: 4420151),
- 106) Rossi, Model RS22, .22 caliber (S/N: 7CA318403P),
- 107) Sears JC Higgins, Model 31, .22 caliber (S/N: Unknown),
- 108) Winchester, Model 290, .22 caliber (S/N: 82175),
- 109) Marlin Firearms Co., Glenfield Model 60, .22 caliber (S/N: Unknown),
- 110) Browning, Model 2000, 12 gauge (S/N: 6B1RP02078),
- 111) Marlin Firearms Co., Model 60, .22 caliber (S/N: 247613),
- 112) Pioneer Arms Corp., Hellpup, 7.62 (S/N: PAC1121009),
- 113) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 114) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 115) Remington, Model 870, 20 gauge (S/N: AB296204U),
- 116) Western Auto, Revelation, 20 gauge (S/N: G930399),
- 117) Browning, Gold Fusion, 20 gauge (S/N: 114MV05196),
- 118) Ted Williams, Model 200, 20 gauge (S/N: P332704),
- 119) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 120) Remington, Model 1100, 20 gauge (S/N: M747707N),

- 121) Savage, Model 110, .223 caliber (S/N: N700900),
- 122) Ruger American, American, .223 caliber (S/N: 691512999),
- 123) Colt, AR-15 A2, .223 caliber (S/N: LGC036843),
- 124) Ruger, Model 10 22, .22 caliber (S/N: 0017-20054),
- 125) Ruger, Model 10 22, .22 caliber (S/N: 251-23420),
- 126) Ruger, Model 10 22, .22 caliber (S/N: 0019-32606),
- 127) Remington, Model 11-48, 16 gauge (S/N: 5517859),
- 128) Remington, Sportman, 16 gauge (S/N: 1539556),
- 129) Ted Williams, Model 3T, .22 caliber (S/N: R236099),
- 130) Browning, Model 22, 20 gauge (S/N: 72399NXY62),
- 131) Remington, Model 870, 20 gauge (S/N: RS66208G),
- 132) Remington, Model 870, 20 gauge (S/N: AB511364U),
- 133) Winchester Model 1200, 20 gauge (S/N: 178283),
- 134) Banelli Arms, Armi, 20 gauge (S/N: CA084107Q16),
- 135) Remington, Wingmaster Model 870, 20 gauge (S/N: V457347X),
- 136) Winchester, Model 140, 20 gauge (S/N: N1058220),
- 137) Remington, Model 870, 20 gauge (S/N: RS03411V),
- 138) Carl Walther, Colt M4 Carbine 22, .22 caliber (S/N: BP018330),
- 139) Remington, Model 870, 20 gauge (S/N: RS35871C),
- 140) Remington, Sportsmaster Mod 511, .22 caliber (S/N: Unknown),
- 141) Ruger, Model 10-22, .22 caliber (S/N: 0022-66722),
- 142) Ruger, Model 10-22, .22 caliber (S/N: 0022-66731),
- 143) Remington, Model 550-1, .22 caliber (S/N: Unknown),

- 144) Ruger, Model 10-22, .22 caliber (S/N: 0023-41263),
- 145) Ruger, Model 10-22, .22 caliber (S/N: 356-86004),
- 146) Ruger, Model 10-22, .22 caliber (S/N: 829-38623),
- 147) Ruger, Model 10-22, .22 caliber (S/N: 354-52212),
- 148) Ruger, Model 10-22, .22 caliber (S/N: 0005-55409),
- 149) Ruger, Model 10-22, .22 caliber (S/N: 0023-06206),
- 150) Ruger, Model 10-22, .22 caliber (S/N: 239-99272),
- 151) Ruger, Model 10-22, .22 caliber (S/N: 0021-84471),
- 152) Ruger, Model 10-22, .22 caliber (S/N: 0023-40850),
- 153) Ruger, Model 10-22, .22 caliber (S/N: 022-66643),
- 154) Remington, Model 700, 7mm (S/N: 125164),
- 155) Remington, Model 700, 7mm (S/N: 170115),
- 156) Remington, Sportsman 48, 12 gauge (S/N: 3038312),
- 157) Ruger, Model 10-22, .22 caliber (S/N: 255-61853),
- 158) Savage, Springfield Mod 67, 410 gauge (S/N: C086343),
- 159) Remington, Wingmaster Mod 870, 20 gauge (S/N: T567631X),
- 160) Remington, Model 597, .22 caliber (S/N: C2676328),
- 161) Savage, Model 64, .22 caliber (S/N: 3857081),
- 162) Marlin Firearms Co., Model 60, .22 caliber (S/N: Unknown),
- 163) Sears JC Higgins, Mod 101.7, mod 311A, 410 gauge (Unknown),
- 164) Mossberg, Model 715T, .22 caliber (S/N: CT2206040),
- 165) Remington, Model 31, 20 gauge (S/N: 580160),
- 166) Rossi, Model RS22, .22 caliber (S/N: 7CA199911N),

- 167) Ruger American, Ruger American, .22 caliber (S/N: 833-77372),
- 168) Winchester, Model 50, 12 gauge (S/N: 16810),
- 169) Marlin Firearms Co., Glenfield Mod 75C, .22 caliber (S/N: 24320893),
- 170) Remington, Fieldmaster Mod 572, .22 caliber (S/N: Unknown),
- 171) Colt, Matchtarget lightweight, .223 caliber (S/N: CSL008593),
- 172) Archangel, Model 556 AR-15, .22 caliber (S/N: 353-66710),
- 173) Remington, Model 870 Magnum, 12 gauge (S/N: A735800M),
- 174) Ruger, Model 10-22, .22 caliber (S/N: 0021-97551),
- 175) Squires Bingham, Model 200, .22 caliber (S/N: 845029),
- 176) Mossberg & Sons, Model 220K, .22 caliber (S/N: Unknown),
- 177) Mossberg Int, Model 715 T, .22 caliber (S/N: MF3789481),
- 178) Palmetto State Arm, Model Pa-15, (S/N: SCD162753),
- 179) Marlin Firearms Co., Model 25N, .22 caliber (S/N: 99349824),
- 180) Remington, Wingmaster Mod 870, 20 gauge (S/N: S732540N),
- 181) Ruger, Model 10-22, .22 caliber (S/N: 820-89793),
- 182) Ruger, Model 10-22, .22 caliber (S/N: 351-14819),
- 183) Ruger, Model 10-22, .22 caliber (S/N: 0021-43746),
- 184) Ruger, Model 10-22, .22 caliber (S/N: 0009-69336),
- 185) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 186) Benelli Arms, Nova, 20 gauge (S/N: BA083580R18),
- 187) Browning, Model 2000, 20 gauge (S/N: 11271C67),

to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient

would constitute a felony (as defined in section 932(a)), in violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b).

COUNT TWO  
[18 U.S.C. § 933(a)(1) and (b)]

On or about October 30, 2023, in the Western District of Texas, Defendant,

SANTIAGO RAMIREZ,

did ship, transport, transfer, cause to be transported, and otherwise dispose of one and more firearms, including but not limited to:

- 1) a Smith & Wesson, Model 469, 9 mm (S/N: A858682),
- 2) Hungarian Arms Works, PPH, .380 caliber (S/N: N03441),
- 3) Glock, Model 44, .22 caliber (S/N: AERZ973),
- 4) a Smith & Wesson, Model M&P9, 9 mm (S/N: HSF7660),
- 5) Berreta, Model M9, 9mm (S/N: M9-223168),
- 6) GSG, Firefly, .22 caliber (S/N: F449159),
- 7) Glock, Model 17 Gen 5, 9mm (S/N: BYVF554),
- 8) Glock, Model 17 Gen 5, 9mm (S/N: BWAB262),
- 9) Glock, Model 44, .22 caliber (S/N: AEEB915),
- 10) Pietro Berreta, Model 99A1, 9mm (S/N: A072722Z),
- 11) Berreta, Model M9 A1, 9mm (S/N: BER754099),
- 12) Berreta, Model 92S, 9mm (S/N: X23195Z),
- 13) Berreta, Model IC34, 9mm (S/N: 673276),
- 14) a Smith & Wesson, Model M&P9, 9 mm (S/N: NCX0317),
- 15) Browning, 9mm pistol (S/N: 633656),

- 16) a Smith & Wesson, Model SD9, 9 mm (S/N: FZU0293),
- 17) Glock, Model 19Gen5 (Frame S/N: ACMR833), (slide S/N: BWSB785),
- 18) Berreta, Model M9, 9mm (S/N: 244366),
- 19) Glock, Model 19Gen5, 9mm (S/N: CAHB678),
- 20) GSG, Firefly, .22 caliber (S/N: F449547),
- 21) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FEF6173),
- 22) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FBU7902),
- 23) a Smith & Wesson, Model SD9VE, 9 mm (S/N: HFK4679),
- 24) Taurus, Model G3, 9mm (S/N: AAM154901),
- 25) Berreta, Model PX4 Storm, .40 caliber (S/N: PY31590),
- 26) Berreta, Model PX4 Storm, 9mm (S/N: PX17189),
- 27) Canik, Model METESFT, 9mm (S/N: T6472-21 CC28289),
- 28) Taurus, Model PT92AF, 9mm (S/N: TGS00427),
- 29) Taurus, Model G3C, 9mm (S/N: ADL954329),
- 30) Ruger, Model P89DC, 9mm (S/N: 304-33818),
- 31) Berreta, Model M9, 9mm (S/N: 234073),
- 32) Glock, Model 19, 9mm (S/N: ESV545US),
- 33) Glock, Model 19, 9mm (S/N: BEBA400),
- 34) Berreta, Model 92FS, 9mm (S/N: BER242581Z),
- 35) Berreta, Model 92FS, 9mm (S/N: BER797601),
- 36) Berreta, Model M9 A1, 9mm (S/N: BER583109),
- 37) Berreta, Model 92 A1, 9mm (S/N: BIN019275),
- 38) Berreta, Model 92X, 9mm (S/N: 92X0042402),

- 39) Berreta, Model 92 FS, 9mm (S/N: BER163805Z),
- 40) Berreta, Model M9, 9mm (S/N: M9-201001),
- 41) Berreta, Model 92X, 9mm (S/N: 92X0050585),
- 42) Berreta, Model APX, 9mm (S/N: A008602X),
- 43) Glock, Model 17, 9mm (S/N: NEA368),
- 44) Berreta, Model 92G, 9mm (S/N: BER454042Z),
- 45) Tisas, Model Faith 13, .380 caliber (S/N: T0620-21J01085),
- 46) Pietro Berreta, Model 75, .22 caliber (S/N: 46026),
- 47) Tanfoglio, Model Titan II, .380 caliber (S/N: EB05403),
- 48) Berreta, Model 92X, 9mm (S/N: 92X0011244),
- 49) Berreta, Model 92FS, 9mm (S/N: BER832190),
- 50) Carl Walther, Model Colt Government, .22 caliber (S/N: LK030667),
- 51) Colt, Model Woodsman, .22 caliber (S/N: 117166-S),
- 52) Berreta, Model M9, .22 caliber (S/N: BM002723),
- 53) Ruger, Model P94, .40 caliber (S/N: 34043514),
- 54) Pietro Berreta, Model 92FS, 9mm (S/N: A207512Z),
- 55) Ruger, Model 10 22, .22 caliber (S/N: 2168331),
- 56) Ruger, Model 10 22, .22 caliber (S/N: 0022-66729),
- 57) Ruger, Model 10 22, .22 caliber (S/N: 0022-94445),
- 58) Ruger, Model 10 22, .22 caliber (S/N: 0021-85762),
- 59) Ruger, Model 10 22, .22 caliber (S/N: 823-86399),
- 60) Ruger, Model 10 22, .22 caliber (S/N: 0024-16244),
- 61) Ruger, Model 10 22, .22 caliber (S/N: 0021-91318),

- 62) Ruger, Model 10 22, .22 caliber (S/N: 0023-20196),
- 63) Ruger, Model 10 22, .22 caliber (S/N: 829-14340),
- 64) Ruger, Model 10 22, .22 caliber (S/N: 355-15686),
- 65) Ruger, Model 10 22, .22 caliber (S/N: 0022-72651),
- 66) Ruger, Model 10 22, .22 caliber (S/N: 0011-54056),
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- 68) Ruger, Model 10 22, .22 caliber (S/N: 0023-00869),
- 69) Ruger, Model 10 22, .22 caliber (S/N: 0021-90177),
- 70) Marlin, Model 60 SB, .22caliber (S/N: 98466378),
- 71) Remington, Model Speedmaster 552, .22 caliber (S/N: A1588225),
- 72) Ranger, Model 101.16, .22 caliber (S/N: Unknown),
- 73) Winchester, Model 190, .22 caliber (S/N: B952546),
- 74) Savage Arms- Stevens, Model Stevens 62, .22 caliber (S/N: L186235),
- 75) Savage Arms, Model 135, .22 caliber (S/N: D795642),
- 76) Rossi, Model RS22, .22 caliber (S/N: 7CA374927R),
- 77) Rossi, Model RS22, .22 caliber (S/N: 7CA397881R),
- 78) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ECF105455),
- 79) Marlin Firearms Co., Model 60, .22 caliber (S/N: 2213098),
- 80) Remington, Sportsmaster 512, .22 caliber (S/N: Unknown),
- 81) Wards Westernfield, Model 87-SB87-TA, .22 caliber (S/N: Unknown),
- 82) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ELJ3537810),
- 83) Mossberg Int, Model 500 A, 12 gauge (S/N: L373290),
- 84) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 22339414),

- 85) Mossberg Int, Model 835, 12 gauge (S/N: UM451569),
- 86) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 21344730),
- 87) Rossi, Model RS22, .22 caliber (S/N: 7CA392350R),
- 88) Savage Arms, Model Stevens 62, .22 caliber (S/N: 621156),
- 89) Savage Arms, Springfield Model 87A, .22 caliber (S/N: Unknown),
- 90) Marlin Firearms Co., Model 60W, .22 caliber (S/N: 4262583),
- 91) J Stevens Arms Co., Springfield Model 87, .22 caliber (S/N: Unknown),
- 92) Remington, Speedmaster 552, .22 caliber (S/N: 1626519),
- 93) Marlin Firearms Co., Model 60, .22 caliber (S/N: MM58080H),
- 94) Winchester, Model 190, .22 caliber (S/N: 317201),
- 95) High Standard Manufacturing, Pointer, 20 gauge (S/N: 3061418),
- 96) Winchester, Model 290, .22 caliber (S/N: 627096),
- 97) Mossberg & Sons, Model 250C, .22 caliber (S/N: Unknown),
- 98) Marlin Firearms Co., Glenfield Mod 75, .22 caliber (S/N: 71438613),
- 99) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 100) Savage Arms, Springfield Model 187R, .22 caliber (S/N: Unknown),
- 101) Mossberg, Blaze, .22 caliber (S/N: RA0031155),
- 102) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 103) Savage, Model 64, .22 caliber (S/N: L247517),
- 104) Sears Ted Williams, Model 34, .22 caliber (S/N: Unknown),
- 105) Savage Arms, Savage 64, .22 caliber (S/N: 4420151),
- 106) Rossi, Model RS22, .22 caliber (S/N: 7CA318403P),
- 107) Sears JC Higgins, Model 31, .22 caliber (S/N: Unknown),

- 108) Winchester, Model 290, .22 caliber (S/N: 82175),
- 109) Marlin Firearms Co., Glenfield Model 60, .22 caliber (S/N: Unknown),
- 110) Browning, Model 2000, 12 gauge (S/N: 6B1RP02078),
- 111) Marlin Firearms Co., Model 60, .22 caliber (S/N: 247613),
- 112) Pioneer Arms Corp., Hellup, 7.62 (S/N: PAC1121009),
- 113) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 114) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 115) Remington, Model 870, 20 gauge (S/N: AB296204U),
- 116) Western Auto, Revelation, 20 gauge (S/N: G930399),
- 117) Browning, Gold Fusion, 20 gauge (S/N: 114MV05196),
- 118) Ted Williams, Model 200, 20 gauge (S/N: P332704),
- 119) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 120) Remington, Model 1100, 20 gauge (S/N: M747707N),
- 121) Savage, Model 110, .223 caliber (S/N: N700900),
- 122) Ruger American, American, .223 caliber (S/N: 691512999),
- 123) Colt, AR-15 A2, .223 caliber (S/N: LGC036843),
- 124) Ruger, Model 10 22, .22 caliber (S/N: 0017-20054),
- 125) Ruger, Model 10 22, .22 caliber (S/N: 251-23420),
- 126) Ruger, Model 10 22, .22 caliber (S/N: 0019-32606),
- 127) Remington, Model 11-48, 16 gauge (S/N: 5517859),
- 128) Remington, Sportman, 16 gauge (S/N: 1539556),
- 129) Ted Williams, Model 3T, .22 caliber (S/N: R236099),
- 130) Browning, Model 22, 20 gauge (S/N: 72399NXY62),

- 131) Remington, Model 870, 20 gauge (S/N: RS66208G),
- 132) Remington, Model 870, 20 gauge (S/N: AB511364U),
- 133) Winchester Model 1200, 20 gauge (S/N: 178283),
- 134) Banelli Arms, Armi, 20 gauge (S/N: CA084107Q16),
- 135) Remington, Wingmaster Model 870, 20 gauge (S/N: V457347X),
- 136) Winchester, Model 140, 20 gauge (S/N: N1058220),
- 137) Remington, Model 870, 20 gauge (S/N: RS03411V),
- 138) Carl Walther, Colt M4 Carbine 22, .22 caliber (S/N: BP018330),
- 139) Remington, Model 870, 20 gauge (S/N: RS35871C),
- 140) Remington, Sportsmaster Mod 511, .22 caliber (S/N: Unknown),
- 141) Ruger, Model 10-22, .22 caliber (S/N: 0022-66722),
- 142) Ruger, Model 10-22, .22 caliber (S/N: 0022-66731),
- 143) Remington, Model 550-1, .22 caliber (S/N: Unknown),
- 144) Ruger, Model 10-22, .22 caliber (S/N: 0023-41263),
- 145) Ruger, Model 10-22, .22 caliber (S/N: 356-86004),
- 146) Ruger, Model 10-22, .22 caliber (S/N: 829-38623),
- 147) Ruger, Model 10-22, .22 caliber (S/N: 354-52212),
- 148) Ruger, Model 10-22, .22 caliber (S/N: 0005-55409),
- 149) Ruger, Model 10-22, .22 caliber (S/N: 0023-06206),
- 150) Ruger, Model 10-22, .22 caliber (S/N: 239-99272),
- 151) Ruger, Model 10-22, .22 caliber (S/N: 0021-84471),
- 152) Ruger, Model 10-22, .22 caliber (S/N: 0023-40850),
- 153) Ruger, Model 10-22, .22 caliber (S/N: 022-66643),

- 154) Remington, Model 700, 7mm (S/N: 125164),
- 155) Remington, Model 700, 7mm (S/N: 170115),
- 156) Remington, Sportsman 48, 12 gauge (S/N: 3038312),
- 157) Ruger, Model 10-22, .22 caliber (S/N: 255-61853),
- 158) Savage, Springfield Mod 67, 410 gauge (S/N: C086343),
- 159) Remington, Wingmaster Mod 870, 20 gauge (S/N: T567631X),
- 160) Remington, Model 597, .22 caliber (S/N: C2676328),
- 161) Savage, Model 64, .22 caliber (S/N: 3857081),
- 162) Marlin Firearms Co., Model 60, .22 caliber (S/N: Unknown),
- 163) Sears JC Higgins, Mod 101.7, mod 311A, 410 gauge (Unknown),
- 164) Mossberg, Model 715T, .22 caliber (S/N: CT2206040),
- 165) Remington, Model 31, 20 gauge (S/N: 580160),
- 166) Rossi, Model RS22, .22 caliber (S/N: 7CA199911N),
- 167) Ruger American, Ruger American, .22 caliber (S/N: 833-77372),
- 168) Winchester, Model 50, 12 gauge (S/N: 16810),
- 169) Marlin Firearms Co., Glenfield Mod 75C, .22 caliber (S/N: 24320893),
- 170) Remington, Fieldmaster Mod 572, .22 caliber (S/N: Unknown),
- 171) Colt, Matchtarget lightweight, .223 caliber (S/N: CSL008593),
- 172) Archangel, Model 556 AR-15, .22 caliber (S/N: 353-66710),
- 173) Remington, Model 870 Magnum, 12 gauge (S/N: A735800M),
- 174) Ruger, Model 10-22, .22 caliber (S/N: 0021-97551),
- 175) Squires Bingham, Model 200, .22 caliber (S/N: 845029),
- 176) Mossberg & Sons, Model 220K, .22 caliber (S/N: Unknown),

- 177) Mossberg Int, Model 715 T, .22 caliber (S/N: MF3789481),
- 178) Palmetto State Arm, Model Pa-15, (S/N: SCD162753),
- 179) Marlin Firearms Co., Model 25N, .22 caliber (S/N: 99349824),
- 180) Remington, Wingmaster Mod 870, 20 gauge (S/N: S732540N),
- 181) Ruger, Model 10-22, .22 caliber (S/N: 820-89793),
- 182) Ruger, Model 10-22, .22 caliber (S/N: 351-14819),
- 183) Ruger, Model 10-22, .22 caliber (S/N: 0021-43746),
- 184) Ruger, Model 10-22, .22 caliber (S/N: 0009-69336),
- 185) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 186) Benelli Arms, Nova, 20 gauge (S/N: BA083580R18),
- 187) Browning, Model 2000, 20 gauge (S/N: 11271C67),

to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony, or is an unlawful user of or addicted to any controlled substance (as defined in section 932(a)) in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT THREE  
[18 U.S.C. § 554 & 371]

At all times relevant to this Indictment:

1. The Commerce Control List (“CCL”), located at Title 15, Code of Federal Regulations, Section 774, details commodities, software, and technology subject to control by the United States Department of Commerce, Bureau of Industry and Security pursuant to the Export Control Reform Act, Title 50, United States Code, Chapter 58.
2. The CCL is part of the Export Administration Regulations (“EAR”), located at Title 15, Code of Federal Regulations, Section 730 *et seq.*
3. Firearms are designated as controlled items in Section 774, Appendix Supplement Number 1 of the CCL.

4. Ammunition is designated as controlled item in Section 774, Appendix Supplement Number 1 of the CCL.
5. According to Title 15, Code of Federal Regulations, Section 736.2, a person may not export an item subject to the EAR to another country if exporting that item to that country requires a license.
6. Exportation of firearms and ammunition to Mexico requires a license.
7. Defendant SANTIAGO RAMIREZ did not have a license or any authority to export firearms or ammunition out of the United States to Mexico.

That on or about October 30, 2023, in the Western District of Texas, Defendant,

SANTIAGO RAMIREZ

did intentionally and knowingly combine, conspire, confederate, and agree together and with other persons known and unknown, to willingly, fraudulently, and knowingly attempt to export, export, and send from the United States, any merchandise, article, and object, to wit:

- 1) a Smith & Wesson, Model 469, 9 mm (S/N: A858682),
- 2) Hungarian Arms Works, PPH, .380 caliber (S/N: N03441),
- 3) Glock, Model 44, .22 caliber (S/N: AERZ973),
- 4) a Smith & Wesson, Model M&P9, 9 mm (S/N: HSF7660),
- 5) Berreta, Model M9, 9mm (S/N: M9-223168),
- 6) GSG, Firefly, .22 caliber (S/N: F449159),
- 7) Glock, Model 17 Gen 5, 9mm (S/N: BYVF554),
- 8) Glock, Model 17 Gen 5, 9mm (S/N: BWAB262),
- 9) Glock, Model 44, .22 caliber (S/N: AEEB915),
- 10) Pietro Berreta, Model 99A1, 9mm (S/N: A072722Z),
- 11) Berreta, Model M9 A1, 9mm (S/N: BER754099),
- 12) Berreta, Model 92S, 9mm (S/N: X23195Z),

- 13) Berreta, Model IC34, 9mm (S/N: 673276),
- 14) a Smith & Wesson, Model M&P9, 9 mm (S/N: NCX0317),
- 15) Browning, 9mm pistol (S/N: 633656),
- 16) a Smith & Wesson, Model SD9, 9 mm (S/N: FZU0293),
- 17) Glock, Model 19Gen5 (Frame S/N: ACMR833), (slide S/N: BWSB785),
- 18) Berreta, Model M9, 9mm (S/N: 244366),
- 19) Glock, Model 19Gen5, 9mm (S/N: CAHB678),
- 20) GSG, Firefly, .22 caliber (S/N: F449547),
- 21) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FEF6173),
- 22) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FBU7902),
- 23) a Smith & Wesson, Model SD9VE, 9 mm (S/N: HFK4679),
- 24) Taurus, Model G3, 9mm (S/N: AAM154901),
- 25) Berreta, Model PX4 Storm, .40 caliber (S/N: PY31590),
- 26) Berreta, Model PX4 Storm, 9mm (S/N: PX17189),
- 27) Canik, Model METESFT, 9mm (S/N: T6472-21 CC28289),
- 28) Taurus, Model PT92AF, 9mm (S/N: TGS00427),
- 29) Taurus, Model G3C, 9mm (S/N: ADL954329),
- 30) Ruger, Model P89DC, 9mm (S/N: 304-33818),
- 31) Berreta, Model M9, 9mm (S/N: 234073),
- 32) Glock, Model 19, 9mm (S/N: ESV545US),
- 33) Glock, Model 19, 9mm (S/N: BEBA400),
- 34) Berreta, Model 92FS, 9mm (S/N: BER242581Z),
- 35) Berreta, Model 92FS, 9mm (S/N: BER797601),

- 36) Berreta, Model M9 A1, 9mm (S/N: BER583109),
- 37) Berreta, Model 92 A1, 9mm (S/N: BIN019275),
- 38) Berreta, Model 92X, 9mm (S/N: 92X0042402),
- 39) Berreta, Model 92 FS, 9mm (S/N: BER163805Z),
- 40) Berreta, Model M9, 9mm (S/N: M9-201001),
- 41) Berreta, Model 92X, 9mm (S/N: 92X0050585),
- 42) Berreta, Model APX, 9mm (S/N: A008602X),
- 43) Glock, Model 17, 9mm (S/N: NEA368),
- 44) Berreta, Model 92G, 9mm (S/N: BER454042Z),
- 45) Tisas, Model Faith 13, .380 caliber (S/N: T0620-21J01085),
- 46) Pietro Berreta, Model 75, .22 caliber (S/N: 46026),
- 47) Tanfoglio, Model Titan II, .380 caliber (S/N: EB05403),
- 48) Berreta, Model 92X, 9mm (S/N: 92X0011244),
- 49) Berreta, Model 92FS, 9mm (S/N: BER832190),
- 50) Carl Walther, Model Colt Government, .22 caliber (S/N: LK030667),
- 51) Colt, Model Woodsman, .22 caliber (S/N: 117166-S),
- 52) Berreta, Model M9, .22 caliber (S/N: BM002723),
- 53) Ruger, Model P94, .40 caliber (S/N: 34043514),
- 54) Pietro Berreta, Model 92FS, 9mm (S/N: A207512Z),
- 55) Ruger, Model 10 22, .22 caliber (S/N: 2168331),
- 56) Ruger, Model 10 22, .22 caliber (S/N: 0022-66729),
- 57) Ruger, Model 10 22, .22 caliber (S/N: 0022-94445),
- 58) Ruger, Model 10 22, .22 caliber (S/N: 0021-85762),

- 59) Ruger, Model 10 22, .22 caliber (S/N: 823-86399),
- 60) Ruger, Model 10 22, .22 caliber (S/N: 0024-16244),
- 61) Ruger, Model 10 22, .22 caliber (S/N: 0021-91318),
- 62) Ruger, Model 10 22, .22 caliber (S/N: 0023-20196),
- 63) Ruger, Model 10 22, .22 caliber (S/N: 829-14340),
- 64) Ruger, Model 10 22, .22 caliber (S/N: 355-15686),
- 65) Ruger, Model 10 22, .22 caliber (S/N: 0022-72651),
- 66) Ruger, Model 10 22, .22 caliber (S/N: 0011-54056),
- 67) Ruger, Model 10 22, .22 caliber (S/N: 0021-99424),
- 68) Ruger, Model 10 22, .22 caliber (S/N: 0023-00869),
- 69) Ruger, Model 10 22, .22 caliber (S/N: 0021-90177),
- 70) Marlin, Model 60 SB, .22caliber (S/N: 98466378),
- 71) Remington, Model Speedmaster 552, .22 caliber (S/N: A1588225),
- 72) Ranger, Model 101.16, .22 caliber (S/N: Unknown),
- 73) Winchester, Model 190, .22 caliber (S/N: B952546),
- 74) Savage Arms- Stevens, Model Stevens 62, .22 caliber (S/N: L186235),
- 75) Savage Arms, Model 135, .22 caliber (S/N: D795642),
- 76) Rossi, Model RS22, .22 caliber (S/N: 7CA374927R),
- 77) Rossi, Model RS22, .22 caliber (S/N: 7CA397881R),
- 78) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ECF105455),
- 79) Marlin Firearms Co., Model 60, .22 caliber (S/N: 2213098),
- 80) Remington, Sportsmaster 512, .22 caliber (S/N: Unknown),
- 81) Wards Westernfield, Model 87-SB87-TA, .22 caliber (S/N: Unknown),

- 82) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ELJ3537810),
- 83) Mossberg Int, Model 500 A, 12 gauge (S/N: L373290),
- 84) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 22339414),
- 85) Mossberg Int, Model 835, 12 gauge (S/N: UM451569),
- 86) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 21344730),
- 87) Rossi, Model RS22, .22 caliber (S/N: 7CA392350R),
- 88) Savage Arms, Model Stevens 62, .22 caliber (S/N: 621156),
- 89) Savage Arms, Springfield Model 87A, .22 caliber (S/N: Unknown),
- 90) Marlin Firearms Co., Model 60W, .22 caliber (S/N: 4262583),
- 91) J Stevens Arms Co., Springfield Model 87, .22 caliber (S/N: Unknown),
- 92) Remington, Speedmaster 552, .22 caliber (S/N: 1626519),
- 93) Marlin Firearms Co., Model 60, .22 caliber (S/N: MM58080H),
- 94) Winchester, Model 190, .22 caliber (S/N: 317201),
- 95) High Standard Manufacturing, Pointer, 20 gauge (S/N: 3061418),
- 96) Winchester, Model 290, .22 caliber (S/N: 627096),
- 97) Mossberg & Sons, Model 250C, .22 caliber (S/N: Unknown),
- 98) Marlin Firearms Co., Glenfield Mod 75, .22 caliber (S/N: 71438613),
- 99) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 100) Savage Arms, Springfield Model 187R, .22 caliber (S/N: Unknown),
- 101) Mossberg, Blaze, .22 caliber (S/N: RA0031155),
- 102) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 103) Savage, Model 64, .22 caliber (S/N: L247517),
- 104) Sears Ted Williams, Model 34, .22 caliber (S/N: Unknown),

- 105) Savage Arms, Savage 64, .22 caliber (S/N: 4420151),
- 106) Rossi, Model RS22, .22 caliber (S/N: 7CA318403P),
- 107) Sears JC Higgins, Model 31, .22 caliber (S/N: Unknown),
- 108) Winchester, Model 290, .22 caliber (S/N: 82175),
- 109) Marlin Firearms Co., Glenfield Model 60, .22 caliber (S/N: Unknown),
- 110) Browning, Model 2000, 12 gauge (S/N: 6B1RP02078),
- 111) Marlin Firearms Co., Model 60, .22 caliber (S/N: 247613),
- 112) Pioneer Arms Corp., Hellup, 7.62 (S/N: PAC1121009),
- 113) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 114) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 115) Remington, Model 870, 20 gauge (S/N: AB296204U),
- 116) Western Auto, Revelation, 20 gauge (S/N: G930399),
- 117) Browning, Gold Fusion, 20 gauge (S/N: 114MV05196),
- 118) Ted Williams, Model 200, 20 gauge (S/N: P332704),
- 119) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 120) Remington, Model 1100, 20 gauge (S/N: M747707N),
- 121) Savage, Model 110, .223 caliber (S/N: N700900),
- 122) Ruger American, American, .223 caliber (S/N: 691512999),
- 123) Colt, AR-15 A2, .223 caliber (S/N: LGC036843),
- 124) Ruger, Model 10 22, .22 caliber (S/N: 0017-20054),
- 125) Ruger, Model 10 22, .22 caliber (S/N: 251-23420),
- 126) Ruger, Model 10 22, .22 caliber (S/N: 0019-32606),
- 127) Remington, Model 11-48, 16 gauge (S/N: 5517859),

- 128) Remington, Sportman, 16 gauge (S/N: 1539556),
- 129) Ted Williams, Model 3T, .22 caliber (S/N: R236099),
- 130) Browning, Model 22, 20 gauge (S/N: 72399NXY62),
- 131) Remington, Model 870, 20 gauge (S/N: RS66208G),
- 132) Remington, Model 870, 20 gauge (S/N: AB511364U),
- 133) Winchester Model 1200, 20 gauge (S/N: 178283),
- 134) Banelli Arms, Armi, 20 gauge (S/N: CA084107Q16),
- 135) Remington, Wingmaster Model 870, 20 gauge (S/N: V457347X),
- 136) Winchester, Model 140, 20 gauge (S/N: N1058220),
- 137) Remington, Model 870, 20 gauge (S/N: RS03411V),
- 138) Carl Walther, Colt M4 Carbine 22, .22 caliber (S/N: BP018330),
- 139) Remington, Model 870, 20 gauge (S/N: RS35871C),
- 140) Remington, Sportsmaster Mod 511, .22 caliber (S/N: Unknown),
- 141) Ruger, Model 10-22, .22 caliber (S/N: 0022-66722),
- 142) Ruger, Model 10-22, .22 caliber (S/N: 0022-66731),
- 143) Remington, Model 550-1, .22 caliber (S/N: Unknown),
- 144) Ruger, Model 10-22, .22 caliber (S/N: 0023-41263),
- 145) Ruger, Model 10-22, .22 caliber (S/N: 356-86004),
- 146) Ruger, Model 10-22, .22 caliber (S/N: 829-38623),
- 147) Ruger, Model 10-22, .22 caliber (S/N: 354-52212),
- 148) Ruger, Model 10-22, .22 caliber (S/N: 0005-55409),
- 149) Ruger, Model 10-22, .22 caliber (S/N: 0023-06206),
- 150) Ruger, Model 10-22, .22 caliber (S/N: 239-99272),

- 151) Ruger, Model 10-22, .22 caliber (S/N: 0021-84471),
- 152) Ruger, Model 10-22, .22 caliber (S/N: 0023-40850),
- 153) Ruger, Model 10-22, .22 caliber (S/N: 022-66643),
- 154) Remington, Model 700, 7mm (S/N: 125164),
- 155) Remington, Model 700, 7mm (S/N: 170115),
- 156) Remington, Sportsman 48, 12 gauge (S/N: 3038312),
- 157) Ruger, Model 10-22, .22 caliber (S/N: 255-61853),
- 158) Savage, Springfield Mod 67, 410 gauge (S/N: C086343),
- 159) Remington, Wingmaster Mod 870, 20 gauge (S/N: T567631X),
- 160) Remington, Model 597, .22 caliber (S/N: C2676328),
- 161) Savage, Model 64, .22 caliber (S/N: 3857081),
- 162) Marlin Firearms Co., Model 60, .22 caliber (S/N: Unknown),
- 163) Sears JC Higgins, Mod 101.7, mod 311A, 410 gauge (Unknown),
- 164) Mossberg, Model 715T, .22 caliber (S/N: CT2206040),
- 165) Remington, Model 31, 20 gauge (S/N: 580160),
- 166) Rossi, Model RS22, .22 caliber (S/N: 7CA199911N),
- 167) Ruger American, Ruger American, .22 caliber (S/N: 833-77372),
- 168) Winchester, Model 50, 12 gauge (S/N: 16810),
- 169) Marlin Firearms Co., Glenfield Mod 75C, .22 caliber (S/N: 24320893),
- 170) Remington, Fieldmaster Mod 572, .22 caliber (S/N: Unknown),
- 171) Colt, Matchtarget lightweight, .223 caliber (S/N: CSL008593),
- 172) Archangel, Model 556 AR-15, .22 caliber (S/N: 353-66710),
- 173) Remington, Model 870 Magnum, 12 gauge (S/N: A735800M),

- 174) Ruger, Model 10-22, .22 caliber (S/N: 0021-97551),
- 175) Squires Bingham, Model 200, .22 caliber (S/N: 845029),
- 176) Mossberg & Sons, Model 220K, .22 caliber (S/N: Unknown),
- 177) Mossberg Int, Model 715 T, .22 caliber (S/N: MF3789481),
- 178) Palmetto State Arm, Model Pa-15, (S/N: SCD162753),
- 179) Marlin Firearms Co., Model 25N, .22 caliber (S/N: 99349824),
- 180) Remington, Wingmaster Mod 870, 20 gauge (S/N: S732540N),
- 181) Ruger, Model 10-22, .22 caliber (S/N: 820-89793),
- 182) Ruger, Model 10-22, .22 caliber (S/N: 351-14819),
- 183) Ruger, Model 10-22, .22 caliber (S/N: 0021-43746),
- 184) Ruger, Model 10-22, .22 caliber (S/N: 0009-69336),
- 185) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 186) Benelli Arms, Nova, 20 gauge (S/N: BA083580R18),
- 187) Browning, Model 2000, 20 gauge (S/N: 11271C67),

which are defense articles as defined under the United States Munitions List, prior to exportation, knowing said merchandise, article, or object to be intended for exportation, contrary to any law or regulation of the United States, in that the defendants had not obtained a license or written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2) & 2778(c) and Title 22, Code of Federal Regulations, Parts 121, 123, & 127, in violation of Title 18, United States Code, Section 554.

#### **Overt Acts**

In furtherance of the conspiracy and to effect the objective of the conspiracy, Defendant and others unknown to the Grand Jury, committed and caused to be committed the following overt acts in the Western District of Texas and elsewhere:

1. At some point during the duration of the conspiracy, Defendant parked his box trailer in a Wal-Mart parking lot so that the above-mentioned 187 firearms could be hidden inside of the box trailer. These firearms were hidden because Defendant was going to take the firearms to Mexico and Defendant knew it was illegal to take firearms from the United States to Mexico without having a license or written authorization for such export.

2. At some point during the duration of the conspiracy, Defendant picked up his box trailer, which contained the above-mentioned 187 firearms that were hidden inside of Defendant's box trailer, and Defendant attempted to cross into Mexico via the Eagle Pass Port of Entry, located in Eagle Pass, Texas, in an attempt to smuggle the above-mentioned firearms into Mexico.

COUNT FOUR  
[18 U.S.C. § 554]

At all times relevant to this Indictment:

1. The Commerce Control List (“CCL”), located at Title 15, Code of Federal Regulations, Section 774, details commodities, software, and technology subject to control by the United States Department of Commerce, Bureau of Industry and Security pursuant to the Export Control Reform Act, Title 50, United States Code, Chapter 58.
2. The CCL is part of the Export Administration Regulations (“EAR”), located at Title 15, Code of Federal Regulations, Section 730 *et seq.*
3. Firearms are designated as controlled items in Section 774, Appendix Supplement Number 1 of the CCL.
4. Ammunition is designated as controlled item in Section 774, Appendix Supplement Number 1 of the CCL.
5. According to Title 15, Code of Federal Regulations, Section 736.2, a person may not export an item subject to the EAR to another country if exporting that item to that country requires a license.

6. Exportation of firearms and ammunition to Mexico requires a license.
7. Defendant SANTIAGO RAMIREZ did not have a license or any authority to export firearms or ammunition out of the United States to Mexico.

Beginning on a date unknown but no later than October 23, 2023 through on or about October 30, 2023, in the Western District of Texas, Defendant,

SANTIAGO RAMIREZ,

knowingly and unlawfully concealed, bought, or facilitated the transportation and concealment of any merchandise, article and object, prior to exportation, knowing the same to be intended for exportation from the United States, contrary to any law or regulation of the United States, to-wit:

- 1) a Smith & Wesson, Model 469, 9 mm (S/N: A858682),
- 2) Hungarian Arms Works, PPH, .380 caliber (S/N: N03441),
- 3) Glock, Model 44, .22 caliber (S/N: AERZ973),
- 4) a Smith & Wesson, Model M&P9, 9 mm (S/N: HSF7660),
- 5) Berreta, Model M9, 9mm (S/N: M9-223168),
- 6) GSG, Firefly, .22 caliber (S/N: F449159),
- 7) Glock, Model 17 Gen 5, 9mm (S/N: BYVF554),
- 8) Glock, Model 17 Gen 5, 9mm (S/N: BWAB262),
- 9) Glock, Model 44, .22 caliber (S/N: AEEB915),
- 10) Pietro Berreta, Model 99A1, 9mm (S/N: A072722Z),
- 11) Berreta, Model M9 A1, 9mm (S/N: BER754099),
- 12) Berreta, Model 92S, 9mm (S/N: X23195Z),
- 13) Berreta, Model IC34, 9mm (S/N: 673276),
- 14) a Smith & Wesson, Model M&P9, 9 mm (S/N: NCX0317),

- 15) Browning, 9mm pistol (S/N: 633656),
- 16) a Smith & Wesson, Model SD9, 9 mm (S/N: FZU0293),
- 17) Glock, Model 19Gen5 (Frame S/N: ACMR833), (slide S/N: BWSB785),
- 18) Berreta, Model M9, 9mm (S/N: 244366),
- 19) Glock, Model 19Gen5, 9mm (S/N: CAHB678),
- 20) GSG, Firefly, .22 caliber (S/N: F449547),
- 21) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FEF6173),
- 22) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FBU7902),
- 23) a Smith & Wesson, Model SD9VE, 9 mm (S/N: HFK4679),
- 24) Taurus, Model G3, 9mm (S/N: AAM154901),
- 25) Berreta, Model PX4 Storm, .40 caliber (S/N: PY31590),
- 26) Berreta, Model PX4 Storm, 9mm (S/N: PX17189),
- 27) Canik, Model METESFT, 9mm (S/N: T6472-21 CC28289),
- 28) Taurus, Model PT92AF, 9mm (S/N: TGS00427),
- 29) Taurus, Model G3C, 9mm (S/N: ADL954329),
- 30) Ruger, Model P89DC, 9mm (S/N: 304-33818),
- 31) Berreta, Model M9, 9mm (S/N: 234073),
- 32) Glock, Model 19, 9mm (S/N: ESV545US),
- 33) Glock, Model 19, 9mm (S/N: BEBA400),
- 34) Berreta, Model 92FS, 9mm (S/N: BER242581Z),
- 35) Berreta, Model 92FS, 9mm (S/N: BER797601),
- 36) Berreta, Model M9 A1, 9mm (S/N: BER583109),
- 37) Berreta, Model 92 A1, 9mm (S/N: BIN019275),

- 38) Berreta, Model 92X, 9mm (S/N: 92X0042402),
- 39) Berreta, Model 92 FS, 9mm (S/N: BER163805Z),
- 40) Berreta, Model M9, 9mm (S/N: M9-201001),
- 41) Berreta, Model 92X, 9mm (S/N: 92X0050585),
- 42) Berreta, Model APX, 9mm (S/N: A008602X),
- 43) Glock, Model 17, 9mm (S/N: NEA368),
- 44) Berreta, Model 92G, 9mm (S/N: BER454042Z),
- 45) Tisas, Model Faith 13, .380 caliber (S/N: T0620-21J01085),
- 46) Pietro Berreta, Model 75, .22 caliber (S/N: 46026),
- 47) Tanfoglio, Model Titan II, .380 caliber (S/N: EB05403),
- 48) Berreta, Model 92X, 9mm (S/N: 92X0011244),
- 49) Berreta, Model 92FS, 9mm (S/N: BER832190),
- 50) Carl Walther, Model Colt Government, .22 caliber (S/N: LK030667),
- 51) Colt, Model Woodsman, .22 caliber (S/N: 117166-S),
- 52) Berreta, Model M9, .22 caliber (S/N: BM002723),
- 53) Ruger, Model P94, .40 caliber (S/N: 34043514),
- 54) Pietro Berreta, Model 92FS, 9mm (S/N: A207512Z),
- 55) Ruger, Model 10 22, .22 caliber (S/N: 2168331),
- 56) Ruger, Model 10 22, .22 caliber (S/N: 0022-66729),
- 57) Ruger, Model 10 22, .22 caliber (S/N: 0022-94445),
- 58) Ruger, Model 10 22, .22 caliber (S/N: 0021-85762),
- 59) Ruger, Model 10 22, .22 caliber (S/N: 823-86399),
- 60) Ruger, Model 10 22, .22 caliber (S/N: 0024-16244),

- 61) Ruger, Model 10 22, .22 caliber (S/N: 0021-91318),
- 62) Ruger, Model 10 22, .22 caliber (S/N: 0023-20196),
- 63) Ruger, Model 10 22, .22 caliber (S/N: 829-14340),
- 64) Ruger, Model 10 22, .22 caliber (S/N: 355-15686),
- 65) Ruger, Model 10 22, .22 caliber (S/N: 0022-72651),
- 66) Ruger, Model 10 22, .22 caliber (S/N: 0011-54056),
- 67) Ruger, Model 10 22, .22 caliber (S/N: 0021-99424),
- 68) Ruger, Model 10 22, .22 caliber (S/N: 0023-00869),
- 69) Ruger, Model 10 22, .22 caliber (S/N: 0021-90177),
- 70) Marlin, Model 60 SB, .22caliber (S/N: 98466378),
- 71) Remington, Model Speedmaster 552, .22 caliber (S/N: A1588225),
- 72) Ranger, Model 101.16, .22 caliber (S/N: Unknown),
- 73) Winchester, Model 190, .22 caliber (S/N: B952546),
- 74) Savage Arms- Stevens, Model Stevens 62, .22 caliber (S/N: L186235),
- 75) Savage Arms, Model 135, .22 caliber (S/N: D795642),
- 76) Rossi, Model RS22, .22 caliber (S/N: 7CA374927R),
- 77) Rossi, Model RS22, .22 caliber (S/N: 7CA397881R),
- 78) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ECF105455),
- 79) Marlin Firearms Co., Model 60, .22 caliber (S/N: 2213098),
- 80) Remington, Sportsmaster 512, .22 caliber (S/N: Unknown),
- 81) Wards Westernfield, Model 87-SB87-TA, .22 caliber (S/N: Unknown),
- 82) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ELJ3537810),
- 83) Mossberg Int, Model 500 A, 12 gauge (S/N: L373290),

- 84) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 22339414),
- 85) Mossberg Int, Model 835, 12 gauge (S/N: UM451569),
- 86) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 21344730),
- 87) Rossi, Model RS22, .22 caliber (S/N: 7CA392350R),
- 88) Savage Arms, Model Stevens 62, .22 caliber (S/N: 621156),
- 89) Savage Arms, Springfield Model 87A, .22 caliber (S/N: Unknown),
- 90) Marlin Firearms Co., Model 60W, .22 caliber (S/N: 4262583),
- 91) J Stevens Arms Co., Springfield Model 87, .22 caliber (S/N: Unknown),
- 92) Remington, Speedmaster 552, .22 caliber (S/N: 1626519),
- 93) Marlin Firearms Co., Model 60, .22 caliber (S/N: MM58080H),
- 94) Winchester, Model 190, .22 caliber (S/N: 317201),
- 95) High Standard Manufacturing, Pointer, 20 gauge (S/N: 3061418),
- 96) Winchester, Model 290, .22 caliber (S/N: 627096),
- 97) Mossberg & Sons, Model 250C, .22 caliber (S/N: Unknown),
- 98) Marlin Firearms Co., Glenfield Mod 75, .22 caliber (S/N: 71438613),
- 99) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 100) Savage Arms, Springfield Model 187R, .22 caliber (S/N: Unknown),
- 101) Mossberg, Blaze, .22 caliber (S/N: RA0031155),
- 102) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 103) Savage, Model 64, .22 caliber (S/N: L247517),
- 104) Sears Ted Williams, Model 34, .22 caliber (S/N: Unknown),
- 105) Savage Arms, Savage 64, .22 caliber (S/N: 4420151),
- 106) Rossi, Model RS22, .22 caliber (S/N: 7CA318403P),

- 107) Sears JC Higgins, Model 31, .22 caliber (S/N: Unknown),
- 108) Winchester, Model 290, .22 caliber (S/N: 82175),
- 109) Marlin Firearms Co., Glenfield Model 60, .22 caliber (S/N: Unknown),
- 110) Browning, Model 2000, 12 gauge (S/N: 6B1RP02078),
- 111) Marlin Firearms Co., Model 60, .22 caliber (S/N: 247613),
- 112) Pioneer Arms Corp., Hellup, 7.62 (S/N: PAC1121009),
- 113) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 114) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 115) Remington, Model 870, 20 gauge (S/N: AB296204U),
- 116) Western Auto, Revelation, 20 gauge (S/N: G930399),
- 117) Browning, Gold Fusion, 20 gauge (S/N: 114MV05196),
- 118) Ted Williams, Model 200, 20 gauge (S/N: P332704),
- 119) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 120) Remington, Model 1100, 20 gauge (S/N: M747707N),
- 121) Savage, Model 110, .223 caliber (S/N: N700900),
- 122) Ruger American, American, .223 caliber (S/N: 691512999),
- 123) Colt, AR-15 A2, .223 caliber (S/N: LGC036843),
- 124) Ruger, Model 10 22, .22 caliber (S/N: 0017-20054),
- 125) Ruger, Model 10 22, .22 caliber (S/N: 251-23420),
- 126) Ruger, Model 10 22, .22 caliber (S/N: 0019-32606),
- 127) Remington, Model 11-48, 16 gauge (S/N: 5517859),
- 128) Remington, Sportman, 16 gauge (S/N: 1539556),
- 129) Ted Williams, Model 3T, .22 caliber (S/N: R236099),

- 130) Browning, Model 22, 20 gauge (S/N: 72399NXY62),
- 131) Remington, Model 870, 20 gauge (S/N: RS66208G),
- 132) Remington, Model 870, 20 gauge (S/N: AB511364U),
- 133) Winchester Model 1200, 20 gauge (S/N: 178283),
- 134) Banelli Arms, Armi, 20 gauge (S/N: CA084107Q16),
- 135) Remington, Wingmaster Model 870, 20 gauge (S/N: V457347X),
- 136) Winchester, Model 140, 20 gauge (S/N: N1058220),
- 137) Remington, Model 870, 20 gauge (S/N: RS03411V),
- 138) Carl Walther, Colt M4 Carbine 22, .22 caliber (S/N: BP018330),
- 139) Remington, Model 870, 20 gauge (S/N: RS35871C),
- 140) Remington, Sportsmaster Mod 511, .22 caliber (S/N: Unknown),
- 141) Ruger, Model 10-22, .22 caliber (S/N: 0022-66722),
- 142) Ruger, Model 10-22, .22 caliber (S/N: 0022-66731),
- 143) Remington, Model 550-1, .22 caliber (S/N: Unknown),
- 144) Ruger, Model 10-22, .22 caliber (S/N: 0023-41263),
- 145) Ruger, Model 10-22, .22 caliber (S/N: 356-86004),
- 146) Ruger, Model 10-22, .22 caliber (S/N: 829-38623),
- 147) Ruger, Model 10-22, .22 caliber (S/N: 354-52212),
- 148) Ruger, Model 10-22, .22 caliber (S/N: 0005-55409),
- 149) Ruger, Model 10-22, .22 caliber (S/N: 0023-06206),
- 150) Ruger, Model 10-22, .22 caliber (S/N: 239-99272),
- 151) Ruger, Model 10-22, .22 caliber (S/N: 0021-84471),
- 152) Ruger, Model 10-22, .22 caliber (S/N: 0023-40850),

- 153) Ruger, Model 10-22, .22 caliber (S/N: 022-66643),
- 154) Remington, Model 700, 7mm (S/N: 125164),
- 155) Remington, Model 700, 7mm (S/N: 170115),
- 156) Remington, Sportsman 48, 12 gauge (S/N: 3038312),
- 157) Ruger, Model 10-22, .22 caliber (S/N: 255-61853),
- 158) Savage, Springfield Mod 67, 410 gauge (S/N: C086343),
- 159) Remington, Wingmaster Mod 870, 20 gauge (S/N: T567631X),
- 160) Remington, Model 597, .22 caliber (S/N: C2676328),
- 161) Savage, Model 64, .22 caliber (S/N: 3857081),
- 162) Marlin Firearms Co., Model 60, .22 caliber (S/N: Unknown),
- 163) Sears JC Higgins, Mod 101.7, mod 311A, 410 gauge (Unknown),
- 164) Mossberg, Model 715T, .22 caliber (S/N: CT2206040),
- 165) Remington, Model 31, 20 gauge (S/N: 580160),
- 166) Rossi, Model RS22, .22 caliber (S/N: 7CA199911N),
- 167) Ruger American, Ruger American, .22 caliber (S/N: 833-77372),
- 168) Winchester, Model 50, 12 gauge (S/N: 16810),
- 169) Marlin Firearms Co., Glenfield Mod 75C, .22 caliber (S/N: 24320893),
- 170) Remington, Fieldmaster Mod 572, .22 caliber (S/N: Unknown),
- 171) Colt, Matchtarget lightweight, .223 caliber (S/N: CSL008593),
- 172) Archangel, Model 556 AR-15, .22 caliber (S/N: 353-66710),
- 173) Remington, Model 870 Magnum, 12 gauge (S/N: A735800M),
- 174) Ruger, Model 10-22, .22 caliber (S/N: 0021-97551),
- 175) Squires Bingham, Model 200, .22 caliber (S/N: 845029),

- 176) Mossberg & Sons, Model 220K, .22 caliber (S/N: Unknown),
- 177) Mossberg Int, Model 715 T, .22 caliber (S/N: MF3789481),
- 178) Palmetto State Arm, Model Pa-15, (S/N: SCD162753),
- 179) Marlin Firearms Co., Model 25N, .22 caliber (S/N: 99349824),
- 180) Remington, Wingmaster Mod 870, 20 gauge (S/N: S732540N),
- 181) Ruger, Model 10-22, .22 caliber (S/N: 820-89793),
- 182) Ruger, Model 10-22, .22 caliber (S/N: 351-14819),
- 183) Ruger, Model 10-22, .22 caliber (S/N: 0021-43746),
- 184) Ruger, Model 10-22, .22 caliber (S/N: 0009-69336),
- 185) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 186) Benelli Arms, Nova, 20 gauge (S/N: BA083580R18),
- 187) Browning, Model 2000, 20 gauge (S/N: 11271C67),

which are controlled items as defined in the CCL, and the Defendant had not received a license or authorization for such export, in violation of Title 50, United States Code, Section 4819 and Title 15, Code of Federal Regulations, Sections 774 and 736.2(b)(1), all in violation of Title 18, United States Code, Section 554.

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
[See FED. R. CRIM. P. 32.2]

**I.**

**Firearms Violation and Forfeiture Statutes**

**[Title 18 U.S.C. § 933(a)(1)/(3), subject to forfeiture pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c).]**

As a result of the foregoing criminal violations set forth in Counts One and Two, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of property, including any items listed below, upon conviction and as a part of sentence pursuant to FED. R.

CRIM. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture pursuant to Title 28 U.S.C. § 2461(c), which states the following:

**Title 18 U.S.C. § 924. Penalties**

**(d)(1)** Any firearm or ammunition involved in or used in . . . any other criminal law of the United States . . . shall be subject to seizure and forfeiture . . .

**II.**

**Firearms Violation and Forfeiture Statute**

**[Title 18 U.S.C. § 933(a)(1)/(3), subject to forfeiture pursuant to Title 18 U.S.C. § 934(a).]**

As a result of the foregoing criminal violation set forth in Counts One and Two, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of property, including any items listed below, upon conviction and as a part sentence pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 982(a)(5), which states the following:

**Title 18 U.S.C. § 934. Forfeiture and fines**

**(a) Forfeiture.—**

**(1) In general.** Any person convicted of a violation of section . . . 933 shall forfeit to the United States, irrespective of any provision of State law—

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, except that for any forfeiture of any firearm or ammunition pursuant to this section, section 924(d) shall apply.

**(2) Imposition.**—The court, in imposing sentence on a person convicted of a violation of section . . . 933, shall order, in addition to any other sentence imposed pursuant to section . . . 933, that the person forfeit to the United States all property described in paragraph (1).

**III.**

**Smuggling Violations and Forfeiture Statutes**

**[Title 18 U.S.C. § 554,**

**subject to forfeiture pursuant to Title 19 U.S.C. § 1595a(d),  
made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c).]**

As a result of the foregoing criminal violation set forth in Counts Three and Four, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of the property, including the items listed below, upon conviction and as part of sentencing pursuant to

FED. R. CRIM. P. 32.2 and Title 19 U.S.C. § 1595a(d), made applicable to criminal forfeiture pursuant to Title 28 U.S.C. § 2461(c), which states the following:

**Title 19 U.S.C. § 1595a. Aiding unlawful importation**

**(d) Merchandise exported contrary to law**

Merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be seized and forfeited to the United States.

This Notice of Demand for Forfeiture includes but is not limited to the following.

- 1) a Smith & Wesson, Model 469, 9 mm (S/N: A858682),
- 2) Hungarian Arms Works, PPH, .380 caliber (S/N: N03441),
- 3) Glock, Model 44, .22 caliber (S/N: AERZ973),
- 4) a Smith & Wesson, Model M&P9, 9 mm (S/N: HSF7660),
- 5) Berreta, Model M9, 9mm (S/N: M9-223168),
- 6) GSG, Firefly, .22 caliber (S/N: F449159),
- 7) Glock, Model 17 Gen 5, 9mm (S/N: BYVF554),
- 8) Glock, Model 17 Gen 5, 9mm (S/N: BWAB262),
- 9) Glock, Model 44, .22 caliber (S/N: AEEB915),
- 10) Pietro Berreta, Model 99A1, 9mm (S/N: A072722Z),
- 11) Berreta, Model M9 A1, 9mm (S/N: BER754099),
- 12) Berreta, Model 92S, 9mm (S/N: X23195Z),
- 13) Berreta, Model IC34, 9mm (S/N: 673276),
- 14) a Smith & Wesson, Model M&P9, 9 mm (S/N: NCX0317),
- 15) Browning, 9mm pistol (S/N: 633656),
- 16) a Smith & Wesson, Model SD9, 9 mm (S/N: FZU0293),
- 17) Glock, Model 19Gen5 (Frame S/N: ACMR833), (slide S/N: BWSB785),
- 18) Berreta, Model M9, 9mm (S/N: 244366),
- 19) Glock, Model 19Gen5, 9mm (S/N: CAHB678),
- 20) GSG, Firefly, .22 caliber (S/N: F449547),
- 21) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FEF6173),
- 22) a Smith & Wesson, Model SD9VE, 9 mm (S/N: FBU7902),
- 23) a Smith & Wesson, Model SD9VE, 9 mm (S/N: HFK4679),
- 24) Taurus, Model G3, 9mm (S/N: AAM154901),
- 25) Berreta, Model PX4 Storm, .40 caliber (S/N: PY31590),

- 26) Berreta, Model PX4 Storm, 9mm (S/N: PX17189),
- 27) Canik, Model METESFT, 9mm (S/N: T6472-21 CC28289),
- 28) Taurus, Model PT92AF, 9mm (S/N: TGS00427),
- 29) Taurus, Model G3C, 9mm (S/N: ADL954329),
- 30) Ruger, Model P89DC, 9mm (S/N: 304-33818),
- 31) Berreta, Model M9, 9mm (S/N: 234073),
- 32) Glock, Model 19, 9mm (S/N: ESV545US),
- 33) Glock, Model 19, 9mm (S/N: BEBA400),
- 34) Berreta, Model 92FS, 9mm (S/N: BER242581Z),
- 35) Berreta, Model 92FS, 9mm (S/N: BER797601),
- 36) Berreta, Model M9 A1, 9mm (S/N: BER583109),
- 37) Berreta, Model 92 A1, 9mm (S/N: BIN019275),
- 38) Berreta, Model 92X, 9mm (S/N: 92X0042402),
- 39) Berreta, Model 92 FS, 9mm (S/N: BER163805Z),
- 40) Berreta, Model M9, 9mm (S/N: M9-201001),
- 41) Berreta, Model 92X, 9mm (S/N: 92X0050585),
- 42) Berreta, Model APX, 9mm (S/N: A008602X),
- 43) Glock, Model 17, 9mm (S/N: NEA368),
- 44) Berreta, Model 92G, 9mm (S/N: BER454042Z),
- 45) Tisas, Model Faith 13, .380 caliber (S/N: T0620-21J01085),
- 46) Pietro Berreta, Model 75, .22 caliber (S/N: 46026),
- 47) Tanfoglio, Model Titan II, .380 caliber (S/N: EB05403),
- 48) Berreta, Model 92X, 9mm (S/N: 92X0011244),
- 49) Berreta, Model 92FS, 9mm (S/N: BER832190),
- 50) Carl Walther, Model Colt Government, .22 caliber (S/N: LK030667),
- 51) Colt, Model Woodsman, .22 caliber (S/N: 117166-S),
- 52) Berreta, Model M9, .22 caliber (S/N: BM002723),
- 53) Ruger, Model P94, .40 caliber (S/N: 34043514),
- 54) Pietro Berreta, Model 92FS, 9mm (S/N: A207512Z),
- 55) Ruger, Model 10 22, .22 caliber (S/N: 2168331),
- 56) Ruger, Model 10 22, .22 caliber (S/N: 0022-66729),
- 57) Ruger, Model 10 22, .22 caliber (S/N: 0022-94445),
- 58) Ruger, Model 10 22, .22 caliber (S/N: 0021-85762),
- 59) Ruger, Model 10 22, .22 caliber (S/N: 823-86399),
- 60) Ruger, Model 10 22, .22 caliber (S/N: 0024-16244),
- 61) Ruger, Model 10 22, .22 caliber (S/N: 0021-91318),
- 62) Ruger, Model 10 22, .22 caliber (S/N: 0023-20196),
- 63) Ruger, Model 10 22, .22 caliber (S/N: 829-14340),
- 64) Ruger, Model 10 22, .22 caliber (S/N: 355-15686),
- 65) Ruger, Model 10 22, .22 caliber (S/N: 0022-72651),

- 66) Ruger, Model 10 22, .22 caliber (S/N: 0011-54056),
- 67) Ruger, Model 10 22, .22 caliber (S/N: 0021-99424),
- 68) Ruger, Model 10 22, .22 caliber (S/N: 0023-00869),
- 69) Ruger, Model 10 22, .22 caliber (S/N: 0021-90177),
- 70) Marlin, Model 60 SB, .22caliber (S/N: 98466378),
- 71) Remington, Model Speedmaster 552, .22 caliber (S/N: A1588225),
- 72) Ranger, Model 101.16, .22 caliber (S/N: Unknown),
- 73) Winchester, Model 190, .22 caliber (S/N: B952546),
- 74) Savage Arms- Stevens, Model Stevens 62, .22 caliber (S/N: L186235),
- 75) Savage Arms, Model 135, .22 caliber (S/N: D795642),
- 76) Rossi, Model RS22, .22 caliber (S/N: 7CA374927R),
- 77) Rossi, Model RS22, .22 caliber (S/N: 7CA397881R),
- 78) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ECF105455),
- 79) Marlin Firearms Co., Model 60, .22 caliber (S/N: 2213098),
- 80) Remington, Sportsmaster 512, .22 caliber (S/N: Unknown),
- 81) Wards Westernfield, Model 87-SB87-TA, .22 caliber (S/N: Unknown),
- 82) Mossberg Int, Model 702 Plinkster, .22 caliber (S/N: ELJ3537810),
- 83) Mossberg Int, Model 500 A, 12 gauge (S/N: L373290),
- 84) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 22339414),
- 85) Mossberg Int, Model 835, 12 gauge (S/N: UM451569),
- 86) Marlin Firearms Co., Glenfield Mod 60, .22 caliber (S/N: 21344730),
- 87) Rossi, Model RS22, .22 caliber (S/N: 7CA392350R),
- 88) Savage Arms, Model Stevens 62, .22 caliber (S/N: 621156),
- 89) Savage Arms, Springfield Model 87A, .22 caliber (S/N: Unknown),
- 90) Marlin Firearms Co., Model 60W, .22 caliber (S/N: 4262583),
- 91) J Stevens Arms Co., Springfield Model 87, .22 caliber (S/N: Unknown),
- 92) Remington, Speedmaster 552, .22 caliber (S/N: 1626519),
- 93) Marlin Firearms Co., Model 60, .22 caliber (S/N: MM58080H),
- 94) Winchester, Model 190, .22 caliber (S/N: 317201),
- 95) High Standard Manufacturing, Pointer, 20 gauge (S/N: 3061418),
- 96) Winchester, Model 290, .22 caliber (S/N: 627096),
- 97) Mossberg & Sons, Model 250C, .22 caliber (S/N: Unknown),
- 98) Marlin Firearms Co., Glenfield Mod 75, .22 caliber (S/N: 71438613),
- 99) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 100) Savage Arms, Springfield Model 187R, .22 caliber (S/N: Unknown),
- 101) Mossberg, Blaze, .22 caliber (S/N: RA0031155),
- 102) Marlin Firearms Co., Model 99, .22 caliber (S/N: Unknown),
- 103) Savage, Model 64, .22 caliber (S/N: L247517),
- 104) Sears Ted Williams, Model 34, .22 caliber (S/N: Unknown),
- 105) Savage Arms, Savage 64, .22 caliber (S/N: 4420151),

- 106) Rossi, Model RS22, .22 caliber (S/N: 7CA318403P),
- 107) Sears JC Higgins, Model 31, .22 caliber (S/N: Unknown),
- 108) Winchester, Model 290, .22 caliber (S/N: 82175),
- 109) Marlin Firearms Co., Glenfield Model 60, .22 caliber (S/N: Unknown),
- 110) Browning, Model 2000, 12 gauge (S/N: 6B1RP02078),
- 111) Marlin Firearms Co., Model 60, .22 caliber (S/N: 247613),
- 112) Pioneer Arms Corp., Hellpup, 7.62 (S/N: PAC1121009),
- 113) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 114) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 115) Remington, Model 870, 20 gauge (S/N: AB296204U),
- 116) Western Auto, Revelation, 20 gauge (S/N: G930399),
- 117) Browning, Gold Fusion, 20 gauge (S/N: 114MV05196),
- 118) Ted Williams, Model 200, 20 gauge (S/N: P332704),
- 119) Remington, Model 550-i, .22 caliber (S/N: Unknown),
- 120) Remington, Model 1100, 20 gauge (S/N: M747707N),
- 121) Savage, Model 110, .223 caliber (S/N: N700900),
- 122) Ruger American, American, .223 caliber (S/N: 691512999),
- 123) Colt, AR-15 A2, .223 caliber (S/N: LGC036843),
- 124) Ruger, Model 10 22, .22 caliber (S/N: 0017-20054),
- 125) Ruger, Model 10 22, .22 caliber (S/N: 251-23420),
- 126) Ruger, Model 10 22, .22 caliber (S/N: 0019-32606),
- 127) Remington, Model 11-48, 16 gauge (S/N: 5517859),
- 128) Remington, Sportman, 16 gauge (S/N: 1539556),
- 129) Ted Williams, Model 3T, .22 caliber (S/N: R236099),
- 130) Browning, Model 22, 20 gauge (S/N: 72399NXY62),
- 131) Remington, Model 870, 20 gauge (S/N: RS66208G),
- 132) Remington, Model 870, 20 gauge (S/N: AB511364U),
- 133) Winchester Model 1200, 20 gauge (S/N: 178283),
- 134) Banelli Arms, Armi, 20 gauge (S/N: CA084107Q16),
- 135) Remington, Wingmaster Model 870, 20 gauge (S/N: V457347X),
- 136) Winchester, Model 140, 20 gauge (S/N: N1058220),
- 137) Remington, Model 870, 20 gauge (S/N: RS03411V),
- 138) Carl Walther, Colt M4 Carbine 22, .22 caliber (S/N: BP018330),
- 139) Remington, Model 870, 20 gauge (S/N: RS35871C),
- 140) Remington, Sportsmaster Mod 511, .22 caliber (S/N: Unknown),
- 141) Ruger, Model 10-22, .22 caliber (S/N: 0022-66722),
- 142) Ruger, Model 10-22, .22 caliber (S/N: 0022-66731),
- 143) Remington, Model 550-1, .22 caliber (S/N: Unknown),
- 144) Ruger, Model 10-22, .22 caliber (S/N: 0023-41263),
- 145) Ruger, Model 10-22, .22 caliber (S/N: 356-86004),

- 146) Ruger, Model 10-22, .22 caliber (S/N: 829-38623),
- 147) Ruger, Model 10-22, .22 caliber (S/N: 354-52212),
- 148) Ruger, Model 10-22, .22 caliber (S/N: 0005-55409),
- 149) Ruger, Model 10-22, .22 caliber (S/N: 0023-06206),
- 150) Ruger, Model 10-22, .22 caliber (S/N: 239-99272),
- 151) Ruger, Model 10-22, .22 caliber (S/N: 0021-84471),
- 152) Ruger, Model 10-22, .22 caliber (S/N: 0023-40850),
- 153) Ruger, Model 10-22, .22 caliber (S/N: 022-66643),
- 154) Remington, Model 700, 7mm (S/N: 125164),
- 155) Remington, Model 700, 7mm (S/N: 170115),
- 156) Remington, Sportsman 48, 12 gauge (S/N: 3038312),
- 157) Ruger, Model 10-22, .22 caliber (S/N: 255-61853),
- 158) Savage, Springfield Mod 67, 410 gauge (S/N: C086343),
- 159) Remington, Wingmaster Mod 870, 20 gauge (S/N: T567631X),
- 160) Remington, Model 597, .22 caliber (S/N: C2676328),
- 161) Savage, Model 64, .22 caliber (S/N: 3857081),
- 162) Marlin Firearms Co., Model 60, .22 caliber (S/N: Unknown),
- 163) Sears JC Higgins, Mod 101.7, mod 311A, 410 gauge (Unknown),
- 164) Mossberg, Model 715T, .22 caliber (S/N: CT2206040),
- 165) Remington, Model 31, 20 gauge (S/N: 580160),
- 166) Rossi, Model RS22, .22 caliber (S/N: 7CA199911N),
- 167) Ruger American, Ruger American, .22 caliber (S/N: 833-77372),
- 168) Winchester, Model 50, 12 gauge (S/N: 16810),
- 169) Marlin Firearms Co., Glenfield Mod 75C, .22 caliber (S/N: 24320893),
- 170) Remington, Fieldmaster Mod 572, .22 caliber (S/N: Unknown),
- 171) Colt, Matchtarget lightweight, .223 caliber (S/N: CSL008593),
- 172) Archangel, Model 556 AR-15, .22 caliber (S/N: 353-66710),
- 173) Remington, Model 870 Magnum, 12 gauge (S/N: A735800M),
- 174) Ruger, Model 10-22, .22 caliber (S/N: 0021-97551),
- 175) Squires Bingham, Model 200, .22 caliber (S/N: 845029),
- 176) Mossberg & Sons, Model 220K, .22 caliber (S/N: Unknown),
- 177) Mossberg Int, Model 715 T, .22 caliber (S/N: MF3789481),
- 178) Palmetto State Arm, Model Pa-15, (S/N: SCD162753),
- 179) Marlin Firearms Co., Model 25N, .22 caliber (S/N: 99349824),
- 180) Remington, Wingmaster Mod 870, 20 gauge (S/N: S732540N),
- 181) Ruger, Model 10-22, .22 caliber (S/N: 820-89793),
- 182) Ruger, Model 10-22, .22 caliber (S/N: 351-14819),
- 183) Ruger, Model 10-22, .22 caliber (S/N: 0021-43746),
- 184) Ruger, Model 10-22, .22 caliber (S/N: 0009-69336),
- 185) Remington, Model 550-i, .22 caliber (S/N: Unknown),

- 186) Benelli Arms, Nova, 20 gauge (S/N: BA083580R18),
- 187) Browning, Model 2000, 20 gauge (S/N: 11271C67), and
- 188) Any related ammunition and firearm accessories.

A TRUE BILL.

[REDACTED]  
FOREPERSON

JAIME ESPARZA

United States Attorney

By:  For

JOSHUA JEROME GARLAND

Assistant United States Attorney